

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOSH COHEN,

Plaintiff,

v.

ACTION NETWORK, AFL-CIO, ACTION
SQUARED, NATHAN WOODHULL,
CIVITECH, DEMOCRATIC NATIONAL
COMMITTEE, MOVEON.ORG, NETROOTS
NATION

Defendants.

Case No. 23-CV-10359 (JPC) (GWG)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law attached hereto, and all pleadings and proceedings heretofore had before this Court, Defendants Action Network, Action Squared, AFL-CIO, MoveOn.org, Civitech PBC, Democratic National Committee, Netroots Nation, and Nathan Woodhull (collectively, “Defendants”), by the undersigned attorneys, move this Court for an Order, pursuant to Federal Rule of Civil Procedure 8(a)(2), dismissing Plaintiff’s Third Amended Complaint with prejudice.

Pursuant to the Court’s January 14, 2025 Order setting a briefing schedule on motions to dismiss filed in this case, ECF No. 80, any opposition to the Defendants’ motion to dismiss shall be filed on or before February 14, 2025. Any reply shall be filed on or before February 28, 2025.

Dated: January 31, 2025

Respectfully submitted,

/s/ Caitlin Kekacs

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*Admitted *pro hac vice*